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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**DISABILITY RIGHTS OREGON,
METROPOLITAN PUBLIC DEFENDER
SERVICES, INC., & A.J. MADISON,**
Plaintiffs,

v.

SAJEL HATHI, in her official capacity as head
of the Oregon Health Authority, & **SARA
WALKER**, in her official capacity as
Superintendent of the Oregon State Hospital,
Defendants.

JAROD BOWMAN and **JOSHAWN
DOUGLAS-SIMPSON**,
Plaintiffs,

v.

SARA WALKER, Interim Superintendent of the
Oregon State Hospital, in her official capacity,
SAJEL HATHI, Director of the Oregon Health
Authority, in her official capacity,
Defendants.

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Case No. 3:02-cv-00339-AN (Lead Case)

Case No. 3:21-cv-01637-AN (Member Case)

PLAINTIFFS' PETITION FOR
ATTORNEYS' FEES AND COSTS

LR 7-1(a) CERTIFICATE OF COMPLIANCE

In compliance with LR 7-1(a), Plaintiff Disability Rights Oregon (“DRO”) hereby certifies they conferred in good faith with Defendants’ counsel regarding the issues in dispute, but the Parties have been unable to reach an agreement.

MOTION

Plaintiff DRO respectfully moves this Court for an award of reasonable attorney fees and costs in the amount of \$214,218.50. Plaintiff makes this motion pursuant to 42 U.S.C. § 1988 and Fed. R. Civ. P. 54(d).

This motion is supported by the following, submitted herewith:

1. Plaintiff’s Brief in Support of its Motion for Attorney Fees and Costs.
2. Declaration of lead counsel, Emily Cooper, in Support of Plaintiff’s Motion for Attorney Fees and Costs;
3. Declaration of Tom Stenson in Support of Plaintiff’s Motion for Attorney Fees and Costs;
4. Declaration of Hanna Morin in Support of Plaintiff’s Motion for Attorney Fees and Costs; and
5. Declaration of Dave Boyer in Support of Plaintiff’s Motion for Attorney Fees and Costs;

A summary of the fees and costs, showing a breakdown of the number of hours and rates of each attorney is attached to Emily Cooper’s Declaration as Exhibits D and E.

In addition, Plaintiff reserves the right to seek recovery for all work performed in this fee petition proceeding, in an amount to be determined and submitted at the appropriate time.

For the reasons set forth herein and in supporting documents, Plaintiff DRO respectfully requests this Court enter an order granting Plaintiff’s Petition for Attorney Fees and Costs in the

amount of \$214,218.50, granting fees and costs for the work performed in the present action in an amount to be calculated, and granting post-judgment interest as appropriate at the current applicable rate.

DATED this 20th day of June, 2025.

Respectfully Submitted:

/s Emily Cooper

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